REMARKS

Claims 1-60 were presented for examination, and claims 1-60 stand rejected. In the current amendment, claims 1, 2, 11, 12, 13, 15, 18, 19, 20, 21, 25, 26, 29, 30, 32, 34, 35, 26, 37, 38, 47, 48, 49, 51, 54, 55, and 57 have been amended. No new matter has been introduced. Upon entry of the current amendment, claims 1-60 will be presently pending in this application, of which claims 1, 13, 19, 25, 30, 35, 37, 49 and 55 are independent. Applicants submit that pending claims 1-60 are in condition for allowance.

The following comments address all stated grounds of rejection. Applicants urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

Claim Amendments

Claims 1, 12, 13, 14, 16-22, 25, 30-31, 33-37, 48-50, and 52-58 have been amended to clarify and more fully appreciate the Applicants' claimed invention. Support for the amended claims can be found on page 6, lines 1-9 and lines 19-21; page 8, lines 1-17; page 12, lines 10-13, Figures 1, 4, 5, 7 and 8; and throughout the remainder of the specification. No new matter has been introduced. Applicants submit that the presently pending claims are in condition for allowance.

Claim Rejections Under 35 U.S.C. §102

I. Claims 1-60 Stand Rejected Under 35 U.S.C §102 As Being Anticipated By Fong

Claims 1-60 stand rejected under 35 U.S.C. §102 as being anticipated by Fong et al. (U.S. Patent No. 6,085,196) ("Fong 96"), which incorporates by reference U.S. Patent No. 6,009,436

("Fong 36") and U.S. Patent No. 6,678,867 ("Fong 67") (collectively referred to as "Fong"). Applicants respectfully traverse this rejection.

A. Independent Claims 1, 25, and 37 Patentably Distinguished Over Fong

Amended Independent claims 1, 25, and 37 are directed to a method, system, and apparatus, respectively, for storing a data object to an object database that stores data objects in a programming language different from the programming language of the data object. These independent claims, as amended, recite a database interface receiving a request to store in a database capable of storing data objects in a second programming language a first data object implemented in a first programming language. The database interface is in communication with the database and is capable of storing data objects implemented in the first programming language or the second programming language to the database. The database interface transforms the first data object in the first programming language to the second data object in the second programming language to include the attributes and attribute values of the class of the first data object. In response to the request to store the first data object implemented in the first programming language, the database interface stores the second data object implemented in the second programming language to the database. Applicants contend that Fong fails to disclose each and every feature of the claimed invention.

Fong does not disclose a database interface in communication with a database and capable of storing data objects implemented in the first programming language or the second programming language to the database. Rather, Fong discusses a document processing system to convert a document from one format to another but allowing the user to interactively define the conversion mapping. Although Fong may use object oriented technologies to implement the

document processing system, Fong is not concerned with a database interface that stores a data object implemented in one programming language to a database that stores data objects in another programming language. As such, Fong does not discuss a database interface providing the features of the claimed invention. The database interface of the claimed invention can store data objects implemented in either a first programming language or the second programming language to a database that stores data objects in the second programming language. If the database interface receives a request to store a first data object implemented in the first programming language, the database interface transforms the first data object into a second data object implemented in the second programming language and stores the second data object to the database. In contrast to the claimed invention, the conventional database of Fong (254, Figure 6B, Fong 96) is not described as having a database interface that performs these features of the claimed invention. Thus, Fong fails to disclose a database interface in communication with a database and capable of storing data objects implemented in the first programming language or the second programming language to the database.

For at least the above-discussed reasons, Fong fails to disclose each and every element of the claimed invention. Therefore, Applicants submit that independent claims 1, 25, and 37 are patentable and in condition for allowance. Claims 2-12 depend on and incorporate the patentable subject matter of independent claim 1. Claims 26-29 depend on and incorporate the patentable subject matter of independent claim 25. Claims 38-48 depend on and incorporate the patentable subject matter of independent claim 37. As such, claims 2-12, 26-29, and 38-48 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of claims 1-12, 25-29 and 37-48 under 35 U.S.C. §102.

B. Independent Claims 13, 30 and 49 Patentably Distinguished over Fong

Amended independent claims 13, 30, and 49 are directed towards a method, system, and apparatus, respectively. These independent claims, as amended, recite a database interface receiving a request from an application that processes data objects in a first programming language for a data object in a database storing the data object in a second programming language. The database interface is in communication with the database and is capable of returning from the database data objects implemented in a first programming language or the second programming language. The database interface accesses the data object from the database and transforms the data object into a transformed data object implemented in a second programming language. The transformed data object includes attributes and attribute values of the class in the accessed data object. In response to the request, the database interface returns the transformed data object to the application. Applicants contend that Fong fails to disclose each and every feature of the claimed invention.

Fong does not disclose a database interface in communication with a database and capable of returning from the database data objects implemented in a first programming language or the second programming language. Although the database stores data objects in a second programming language, the database interface of the claimed invention can return data objects implemented in either a first programming language or the second programming language. In contrast to the claimed invention, Fong does not discuss a database interface that returns data objects in a programming language different than the programming language used to store the data objects in the database. Rather than discussing a database interface, Fong discusses a document processing system to convert a document from one format to another using a conventional database. As such, Fong fails to disclose a database interface in communication

with a database and capable of returning from the database data objects implemented in a first programming language or the second programming language.

For at least the above-discussed reasons, Fong fails to disclose each and every element of the claimed invention. Therefore, Applicants submit that independent claims 13, 30, and 49 are patentable and in condition for allowance. Claims 14-18 depend on and incorporate the patentable subject matter of independent claim 13. Claims 31-34 depend on and incorporate the patentable subject matter of independent claim 30. Claims 50-54 depend on and incorporate the patentable subject matter of independent claim 49. As such, claims 14-18, 31-34, and 50-54 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of claims 13-18, 30-34, and 50-54 under 35 U.S.C. §102.

C. Independent Claims 19, 35 and 55 Patentably Distinguished over Fong

Amended independent claims 19, 35, and 55 are directed are towards a method, system and apparatus, respectively. These independent claims, as amended, recite a database interface receiving a definition of a class and attributes in the class of a first data object implemented in a first programming language, generating a file, and adding information to the file to provide a class schema representing the class and each attribute in the class. The database interface is in communication with a database and capable of storing the first data object implemented in the first programming language or the first data object implemented in a second programming language to the database. Applicants contend that Fong fails to disclose each and every feature of the claimed invention.

Fong does not disclose a database interface in communication with a database and capable of storing the first data object implemented in the first programming language or the first data object implemented in a second programming language to the database. The database interface of the claimed invention can store the data object implemented in either a first or second programming language to the database. In contrast to the claimed invention, Fong does not discuss a database interface that stores to a database a data object in a programming language different than the programming language used to implement the data object. Rather than discussing a database interface, Fong is focused on the conversion of a document from one format to another using a conventional database. As such, Fong fails to disclose a database interface in communication with a database and capable of storing the first data object implemented in the first programming language or the first data object implemented in a second programming language to the database.

For at least the above-discussed reasons, Fong fails to disclose each and every element of the claimed invention. Therefore, Applicants submit that claims 19, 35, and 55 are patentable and in condition for allowance. Claims 20-24 depend on and incorporate the patentable subject matter of independent claim 19. Claim 36 depends on and incorporates the patentable subject matter of independent claim 35. Claims 56-60 depend on and incorporate the patentable subject matter of independent claim 55. As such, claims 20-24, 36, and 56-60 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of claims 19-24, 35-36, and 55-60 under 35 U.S.C. §102.

CONCLUSION

In light of the aforementioned amendments and arguments, Applicants contend that each of the Examiners rejections has been adequately addressed and the pending application is in condition for allowance.

Should the Examiner feel that a telephone conference with Applicants' attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicants' attorney at (617) 227-7400.

Respectfully submitted,
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